

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ROBERT H. KOONS, JR. and  
SALLY KOONS

Plaintiffs,

v.

CIVIL ACTION  
02-CV-2739

PIEDMONT HAWTHORNE AVIATION, :  
HAWTHORNE A-B-E, INC. :  
n/k/a HAWTHORNE AIRPORT :  
SERVICES, INC., and PIEDMONT :  
HAWTHORNE HOLDINGS, INC. :  
Defendants. :

**ADDENDUM TO DEFENDANTS' PRE-TRIAL MEMORANDUM**

Defendants submit the following addendum to their Pre-Trial Memorandum to add the following additional witnesses:

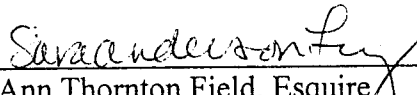
**I. Witnesses - Liability**

1. Nate Askew, General Manager  
Piedmont Hawthorne  
3003 Control Tower Road  
Fayetteville Regional AP  
Fayetteville, NC 28306
2. J.J. – last name and address unknown.

Respectfully submitted,

COZEN O'CONNOR

BY:

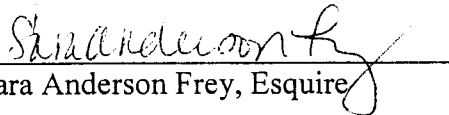
  
Ann Thornton Field, Esquire  
Attorney I.D. No. 52310  
Sara Anderson Frey, Esquire  
Attorney I.D. No. 82835  
1900 Market Street  
Philadelphia, PA 19103  
(215) 665-2000  
Attorneys for Defendants

Date: November 7, 2003

**CERTIFICATE OF SERVICE**

I, Sara Anderson Frey, Esquire, attorney for Defendants, do hereby certify that a copy of the foregoing Addendum to Pre-Trial Memorandum has been served upon counsel by facsimile and United States Mail, postage prepaid this 7<sup>th</sup> day of November, 2003, as follows:

Richard Genter, Esquire  
Wolk & Genter  
1710-12 Locust Street  
Philadelphia, PA 19103

  
Sara Anderson Frey, Esquire